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Filing date: **10/05/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91223510
Party	Defendant Acelero Learning Data and Technical Assistance, Inc. stance, Inc.
Correspondence Address	JAVIER J. RAMOS MILBANK, TWEED, HADLEY & MCCLOY LLP 1850 K ST NW STE 1100 WASHINGTON, DC 20006-2236 dcip@milbank.com;jramos@milbank.com
Submission	Motion to Extend
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Date	10/05/2015
Attachments	02013.27319D - Mtn for EOT re Answer 2015-10-05.pdf(36834 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of:

Application Serial No. 86/257,568

For the Mark: SHINE INSIGHT

Published in the *Official Gazette (Trademarks)* on April 28, 2015

Opposition filed on August 26, 2015

SYMPPLICITY CORP.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91223510
)	
ACELERO LEARNING DATA AND)	
TECHNICAL ASSISTANCE, INC.,)	
)	
Applicant.)	

MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Named Applicant, Acelero Learning Data and Technical Assistance, Inc., moves the Board for an extension of time to file its Answer up to and including November 30, 2015. Counsel for Applicant attempted to reach counsel for Opposer by telephone and e-mail to obtain consent for this motion and to discuss possible settlement options, but was unsuccessful.

An extension of time is required in order for Applicant to continue gathering sufficient facts for Answering the Notice of Opposition filed August 26, 2015 and to confer with its counsel regarding the same. Specifically, a number of key persons employed by Applicant have at times been unavailable to assist in formulating the Answer and/or participating in work relating to any settlement discussions.

Finally, Applicant believes that the extension requested herein will not prejudice any party and may result in a benefit to both parties if settlement can be reached.

WHEREFORE, Applicant requests that the Board enter an order granting Applicant an extension of time through November 30, 2015 to serve its Answer to Opposer's Notice of Opposition.

Respectfully submitted,

Date: October 5, 2015

By: /s/ Javier J. Ramos

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CERTIFICATE OF SERVICE

I, Javier Ramos, do hereby certify that on October 5, 2015, I caused to be served a true and correct copy of APPLICANT'S MOTION FOR EXTENSION OF TIME TO FILE ANSWER:

By First Class Mail:

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Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed on October 5, 2015.

/Javier J. Ramos/

Javier J. Ramos